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April 26, 2005

Via telefax 617-227-9231 & US Mail

Carlton Dasent, Esq.
27 School Street, Suite 400
Boston, MA 02108

RE: Pechner-James and Fernandez v. City of Revere, et als

Dear Mr. Dasent:

I write regarding our phone conversation of Monday, April 11, 2005 and my subsequent letter sent to you on April 14, 2005. In these communications it was confirmed that you had a box of documents believed to be responsive to our earlier sent document request, which was overdue. You told me that you preferred to deliver the documents to our office in Worcester as you were going to be in the area the week of April 18, 2005. I informed you that I would make myself available to meet with you when you dropped off the documents to discuss the case, but would review the documents separately. The week has come and gone and you have not delivered the documents as per our agreement or communicated with our office to explain why. The discovery is now long overdue and although an extension was given to you as a courtesy, the agreement was that you were to have delivered the documents during the week of April 18, 2005.

I wish to resolve the matter without the court's involvement but you are making it difficult to do so by your lack of cooperation. It appears a motion to compel and motion for sanctions is necessary at this junction to obtain the discovery.

Should you wish to resolve these matters without the court's involvement please call.

Very truly yours,



John K. Vigliotti

cc: Revere Solicitor's Office (Via telefax 781-286-8205)
James Dilday, Esq. (Via telefax 617-227-9231 & US Mail)